



August 23, 2021

SENT VIA EMAIL TO M. SCHULTE

Water Enforcement and Compliance Assurance Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency
Region 5
Attn: Matthew Schulte, ECW-15J
77 W. Jackson Boulevard
Chicago, Illinois 60604

Re: Renergy's Response to US EPA's Request to Provide Information Pursuant to the Clean Water Act dated 6/8/2021

Dear Mr. Schulte:

Renergy Inc. ("Renergy") hereby submits its response to US EPA's information request brought pursuant to its authority under Section 308(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1318(a).

Renergy submitted preliminary information to US EPA on July 8, 2021 that was not fully responsive to the information request. Renergy was given until August 23, 2021 to complete its response.

For over a month, Renergy, a small family owned business with few employees, has spent significant time and effort gathering and reviewing the requested information. Renergy was able fully respond to the majority of the information requests. With respect to requests 6 and 7, the information requested is not readily available. The Ohio Environmental Protection Agency ("OEPA") has this information stored electronically or in Renergy's file.

Renergy's narrative responses to the thirteen (13) requests are as follows:

Request 1 - Provide the following for all facilities owned and/or operated by Renergy in the State of Ohio, including the facilities located at 2279 Country Road 156, Cardington, Ohio 43315 and 1146 Herr Road, Fairborn, Ohio 45324.

i. Dovetail, 1156 Herr Rd, Fairborn, OH, 45324

a. Identify the name and address of the facility: Dovetail Energy, 1156 Herr Rd, Fairborn, OH, 45324

b. Identify the name and address of the owner and operator of the facility for the period of January 1, 2016 to the present: Renergy, Inc., PO Box 249, Delaware, OH, 43015. Note that Quasar Energy Group (QEG) owned 20% of this facility through early 2017. Renergy acquired QEG's interest March 31, 2017.

c. Provide a complete copy, if any, of the NPDES Permit and NPDES Permit application in effect for the facility for the period of January 1, 2016 to the present: Uploaded to the corresponding folder in the data room.

d. If the facility does not have an NPDES permit, provide a detailed explanation why it does not: Not applicable.

ii. Emerald, 2279 County Road 156, Cardington, OH, 43315

a. Identify the name and address of the facility: Emerald BioEnergy, 2279 County Road 156, Cardington, OH, 43315

b. Identify the name and address of the owner and operator of the facility for the period of January 1, 2016 to the present: Renergy, Inc., PO Box 249, Delaware, OH, 43015. Note that Quasar Energy Group (QEG) owned 20% of this facility through early 2017. Renergy acquired QEG's interest March 31, 2017.

c. Provide a complete copy, if any, of the NPDES Permit and NPDES Permit application in effect for the facility for the period of January 1, 2016 to the present: Uploaded to the corresponding folder in the data room.

d. If the facility does not have an NPDES permit, provide a detailed explanation why it does not: Not applicable.

iii. Steamtown, 2133 Township Road 224, Ashley, OH, 43003

a. Identify the name and address of the facility: Steamtown, 2133 Township Road 224, Ashley, OH, 43003

b. Identify the name and address of the owner and operator of the facility for the period of January 1, 2016 to the present: Renergy, Inc., PO Box 249, Delaware, OH, 43015

c. Provide a complete copy, if any, of the NPDES Permit and NPDES Permit application in effect for the facility for the period of January 1, 2016 to the present: N/A - Ohio EPA does not require a NPDES permit for Steamtown does not require a NPDES permit.

d. If the facility does not have an NPDES permit, provide a detailed explanation why it does not: Not applicable - Ohio EPA does not require a NPDES permit for Steamtown.

Michael Oberfield

Request 2 - For each facility identified in response to Question 1, where applicable, provide a map or diagram along with a narrative description of the facility that clearly identifies and labels.

i. Dovetail (uploaded to the corresponding folder in the data room)

- a. All access points and roads:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- b. All processing and manufacturing units:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- c. Raw material storage locations:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- d. Intermediate products storage locations:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- e. Final Products storage locations:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- f. By-product locations:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- g. Waste storage locations:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- h. Wastewater collection and conveyance features:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- i. Wastewater treatment equipment:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- j. Sludge storage facilities:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- k. Sludge drying, processing and transfer facilities:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- l. Storm water collection features and ponds:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- m. Drainage features:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- n. Locations of tile drains and their outlets:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- o. Land application fields used for wastewater and sludge disposal:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- p. Permitted outfalls:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.
- q. All locations where any wastewater leaves the facility, other than permitted outfalls:** There are no outfalls.
- r. Receiving waters:** See the Dovetail diagrams in folder “Request 2 - Facility Diagrams”.

ii. Emerald (uploaded to the corresponding folder in the data room)

- a. All access points and roads:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- b. All processing and manufacturing units:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- c. Raw material storage locations:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- d. Intermediate products storage locations:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- e. Final Products storage locations:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- f. By-product locations:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- g. Waste storage locations:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.

- h. Wastewater collection and conveyance features:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- i. Wastewater treatment equipment:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- j. Sludge storage facilities:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- k. Sludge drying, processing and transfer facilities:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- l. Storm water collection features and ponds:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- m. Drainage features:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- n. Locations of tile drains and their outlets:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- o. Land application fields used for wastewater and sludge disposal:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- p. Permitted outfalls:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.
- q. All locations where any wastewater leaves the facility, other than permitted outfalls:** There are no outfalls.
- r. Receiving waters:** See the Emerald diagrams labeled “Request 2 - Facility Diagrams”.

iii. Steamtown (uploaded to the corresponding folder in the data room)

- a. All access points and roads:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- b. All processing and manufacturing units:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- c. Raw material storage locations:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- d. Intermediate products storage locations:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- e. Final Products storage locations:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- f. By-product locations:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- g. Waste storage locations:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- h. Wastewater collection and conveyance features:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- i. Wastewater treatment equipment:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- j. Sludge storage facilities:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- k. Sludge drying, processing and transfer facilities:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- l. Storm water collection features and ponds:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- m. Drainage features:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.
- n. Locations of tile drains and their outlets:** See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.

o. Land application fields used for wastewater and sludge disposal: See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.

p. Permitted outfalls: See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.

q. All locations where any wastewater leaves the facility, other than permitted outfalls: See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.

r. Receiving waters: See the Steamtown diagrams labeled “Request 2 - Facility Diagrams”.

Michael Oberfield

Request 3 - Provide the name and title of the manager or responsible person for the operations of each facility identified in response to Question 1, for January 1, 2016 to the present.

i. Dovetail

Robert Schafer, Operations Manager
Logan Randles, Director of Operations
Frederick R. Oberfield, Contractor

ii. Emerald

Joshua Ropke, Operations Manager
Robert Schafer, Operations Manager
Logan Randles, Director of Operations
Frederick R. Oberfield, Contractor

iii. Steamtown.

Logan Randles, Director of Operations
Frederick R. Oberfield, Contractor

Michael Oberfield

Request 4 - Provide a detailed, narrative description of the current operations at each facility identified in response to Question 1.

i. Dovetail

a. Nature and average monthly quantity and/or volumes of waste received by facility: Non-hazardous organic waste. Data uploaded to the corresponding folder in the data room.

b. Description of treatment provided to waste received by the facility: Anaerobic Digestion

c. Any changes in the operations of the facility, including in the nature of waste received by facility or treatment provided to the waste, that has occurred since January 1, 2016: The facility ceased receipt of class B biosolids on October 1, 2020.

ii. Emerald

- a. Nature and average monthly quantity and/or volumes of waste received by facility:** Non-hazardous organic waste. Data uploaded to the corresponding folder in the data room.
- b. Description of treatment provided to waste received by the facility:** Anaerobic Digestion and Secondary Anaerobic Treatment in anaerobic treatment lagoons (“ATLs”).
- c. Any changes in the operations of the facility, including in the nature of waste received by facility or treatment provided to the waste, that has occurred since January 1, 2016:** The facility ceased receipt of class B biosolids on July 1, 2020.

iii. Steamtown

- a. Nature and average monthly quantity and/or volumes of waste received by facility:** Non-hazardous organic waste. Data uploaded to the corresponding folder in the data room.
- b. Description of treatment provided to waste received by the facility:** Anaerobic Treatment in anaerobic treatment lagoons.
- c. Any changes in the operations of the facility, including in the nature of waste received by facility or treatment provided to the waste, that has occurred since January 1, 2016:** Not applicable.

Michael Oberfield

Request 5 - For each facility identified in response to Question 1, for January 1, 2016 to the present.

Data uploaded to the corresponding folder in the data room. Note there are extensive files related to beneficial reuse.

i. Dovetail

- a. Identify if the facility uses or produces digester effluent:** Dovetail produces digester effluent.
- b. Identify if the facility uses or produces biosolids:** Dovetail processed biosolids until October 1, 2020. The digester effluent produced by Dovetail is considered a class b biosolid pending Ohio EPA determination that the system no longer contains biosolids.
- c. Describe the processes by which the facility treats digester effluent or biosolids and include the quantities and/or volumes that are treated on a weekly basis:** Anaerobic Treatment. Volume data uploaded to the corresponding folder in the data room. *See* “Material Movement 2019-2021.xlsx”.
- d. Provide the locations where digester effluent and biosolids are stored along with the size and/or volume capacities of the storage containers:** Drawings uploaded to data room. *See* “Request 2”.
- e. Provide the processes by which digester effluent and biosolids are transferred along with the average quantity and/or volume transferred on a monthly basis:** Volume data uploaded to the corresponding folder in the data room. *See* “Material Movement 2019-2021.xlsx”. Drawings uploaded to data room. *See* “Request 2”.
- f. Provide the processes by which digester effluent and biosolids are beneficially used:** Land application on traditional crop fields in accordance with OEPA guidelines.

g. Identify if a third party is involved in the beneficial reuse and land application of digester effluent or biosolids: Yes.

h. If yes to g, provide the name, address, and contact information of the third party: (1) Burkey Excavating, 3300 E Smithville Western Rd, Smithville, OH, 44677 (Jim Burkey); (2) Raw Handling, 7733 Prospect Delaware Rd, Prospect, OH, 43342 (Richard Ashton); and Kizer Ag Services, 10819 Old Troy Pike, Saint Paris, OH, 43072 (Jesse Kizer)

i. If yes to g, provide the locations where digester effluent and biosolid beneficial reuse has occurred: See OEPA Biosolids Land Application Map.
<https://oeпа.maps.arcgis.com/apps/webappviewer/index.html?id=40d4dfa29d0b48d49dfe54b543371813>

j. Identify whether any digester effluent, biosolids, or other materials received or generated were not beneficially reused: Not applicable.

k. If yes to j, describe how the facility handled and disposed the materials not beneficially reused and provide the quantities and/or volumes: Not applicable.

ii. Emerald

a. Identify if the facility uses or produces digester effluent: Emerald produces digester effluent.

b. Identify if the facility uses or produces biosolids: Emerald processed biosolids until July 1, 2020. On August 16, 2021, OEPA issued a concurrence that it agreed with Renergy's *Biosolids and/or Liquid Biosolids Weight of the Evidence Demonstration for Renergy's Emerald Facility Located at 2279 County Road 156, Morrow County, Westfield Twp., Ohio*. The Emerald facility is deemed "biosolid free" as of the date of OEPA's concurrence.

c. Describe the processes by which the facility treats digester effluent or biosolids and include the quantities and/or volumes that are treated on a weekly basis: Anaerobic Treatment. Volume data uploaded to the corresponding folder in the data room. See "Material Movement 2019-2021.xlsx".

d. Provide the locations where digester effluent and biosolids are stored along with the size and/or volume capacities of the storage containers: Drawings uploaded to data room. See "Request 2".

e. Provide the processes by which digester effluent and biosolids are transferred along with the average quantity and/or volume transferred on a monthly basis: Volume data uploaded to the corresponding folder in the data room. See "Material Movement 2019-2021.xlsx". Drawings uploaded to data room. See "Request 2".

f. Provide the processes by which digester effluent and biosolids are beneficially used: Land application on traditional crop fields in accordance with OEPA guidelines.

g. Identify if a third party is involved in the beneficial reuse and land application of digester effluent or biosolids: Yes.

h. If yes to g, provide the name, address, and contact information of the third party: (1) Burkey Excavating, 3300 E Smithville Western Rd, Smithville, OH, 44677 (Jim Burkey); (2) Raw Handling, 7733 Prospect Delaware Rd, Prospect, OH, 43342 (Richard Ashton); and (3) Kizer Ag Services, 10819 Old Troy Pike, Saint Paris, OH, 43072 (Jesse Kizer)

i. If yes to g, provide the locations where digester effluent and biosolid beneficial reuse has occurred: See OEPA Biosolids Land Application Map.
<https://oeпа.maps.arcgis.com/apps/webappviewer/index.html?id=40d4dfa29d0b48d49dfe54b543371813>

j. Identify whether any digester effluent, biosolids, or other materials received or generated were not beneficially reused: Not Applicable

k. If yes to j, describe how the facility handled and disposed the materials not beneficially reused and provide the quantities and/or volumes: Not applicable.

iii. Steamtown

a. Identify if the facility uses or produces digester effluent: The facility processes digester effluent but yields industrial wastewater as defined by OEPA.

b. Identify if the facility uses or produces biosolids: The facility uses biosolids in the form of digester effluent that had been designated as a class b biosolid. It does not produce biosolids.

c. Describe the processes by which the facility treats digester effluent or biosolids and include the quantities and/or volumes that are treated on a weekly basis: Anaerobic Treatment in an anaerobic treatment lagoons. Volume data uploaded to the corresponding folder in the data room. See "Material Movement 2019-2021.xlsx".

d. Provide the locations where digester effluent and biosolids are stored along with the size and/or volume capacities of the storage containers: Drawings uploaded to data room. See "Request 2".

e. Provide the processes by which digester effluent and biosolids are transferred along with the average quantity and/or volume transferred on a monthly basis: Volume data uploaded to the corresponding folder in the data room. See "Material Movement 2019-2021.xlsx". Drawings uploaded to data room. See "Request 2".

f. Provide the processes by which digester effluent and biosolids are beneficially used: Land application on traditional crop fields in accordance with OEPA guidelines. This is done by center pivot irrigation at this site.

g. Identify if a third party is involved in the beneficial reuse and land application of digester effluent or biosolids: Yes.

h. If yes to g, provide the name, address, and contact information of the third party: (1) Ringler Livestock, PO Box 249, Delaware, OH, 43015 (Tim Dawson)

i. If yes to g, provide the locations where digester effluent and biosolid beneficial reuse has occurred: 2133 Township Road 224, Ashley, OH, 43003

j. Identify whether any digester effluent, biosolids, or other materials received or generated were not beneficially reused: Not applicable.

k. If yes to j, describe how the facility handled and disposed the materials not beneficially reused and provide the quantities and/or volumes: Not applicable.

Michael Oberfield

Request 6 - Provide the following information for any monitoring that has been performed at the facilities identified in response to Question 1, as required by an NPDES permit, at any time since January 2016, including all monitoring results and including any discharge monitoring reports. At a minimum, the following must be provided for each monitoring event.

i. Dovetail

a. Date, time, and place (specific location) of each sample or measurement taken:

- b. The person(s) who collected the samples or measurements, including their title(s) and affiliation(s) to the facility:**
- c. Flow rate at the time of the sampling or measurement:**
- d. Sampling methods employed in collecting and processing each sample:**
- e. Whether the sample(s)/measurements are a true representation of daily operations, normal work cycles, and then-present conditions at the facility:**
- f. Who analyzed the samples and whether this person is an employee of the facility or a contractor (and, if a contractor, the name of the contractor):**
- g. Sample analysis test methods:**
- h. Results of all monitoring, including all sample analysis (both daily maximum and average concentration for each parameter analyzed, as applicable):**
- i. Whether the samples or monitoring results have ever been submitted to the City of Cardington, City of Fairborn, OEPA, or EPA and, if so, on what date(s) or approximate date(s). Provide copies of any such submittals:**
- j. Whether the monitoring results indicated noncompliance:**
- k. If yes to j, what corrective actions were taken to resolve noncompliance:**

Renergy's response: The NPDES information is not readily available to Renergy. All monitoring results and reporting requirements are submitted to OEPA electronically in accordance with the NPDES permit. *See Request 1 - General Facility Information.* Renergy does not have the ability to provide this information because it is in the possession of OEPA.

ii. Emerald

- a. Date, time, and place (specific location) of each sample or measurement taken:**
- b. The person(s) who collected the samples or measurements, including their title(s) and affiliation(s) to the facility:**
- c. Flow rate at the time of the sampling or measurement:**
- d. Sampling methods employed in collecting and processing each sample:**
- e. Whether the sample(s)/measurements are a true representation of daily operations, normal work cycles, and then-present conditions at the facility:**
- f. Who analyzed the samples and whether this person is an employee of the facility or a contractor (and, if a contractor, the name of the contractor):**
- g. Sample analysis test methods:**
- h. Results of all monitoring, including all sample analysis (both daily maximum and average concentration for each parameter analyzed, as applicable):**
- i. Whether the samples or monitoring results have ever been submitted to the City of Cardington, City of Fairborn, OEPA, or EPA and, if so, on what date(s) or approximate date(s). Provide copies of any such submittals:**
- j. Whether the monitoring results indicated noncompliance:**
- k. If yes to j, what corrective actions were taken to resolve noncompliance:**

Renergy's response: The NPDES information is not readily available to Renergy. All monitoring results and reporting requirements are submitted to OEPA electronically in accordance with the NPDES permit. *See Request 1 - General Facility Information.* Renergy does not have the ability to provide this information because it is in the possession of OEPA.

iii. Steamtown

Not applicable - Steamtown does not require a NPDES permit.

Michael Oberfield

Request 7 - For the monitoring system and procedures at each facility identified in response to Question 1, provide the following information, including any modifications thereto, as applicable from January 1, 2016 to the present.

i. Dovetail

a. A clear description of each monitoring location(s) in relation to the wastewater streams at your facility, including but not limited to the streams described in response to Question 2 above:

b. A diagram that clearly identifies and labels the monitoring system components:

c. A document identifying the monitoring methods used and your justification for selecting these methods:

d. Photo(s) of the monitoring location(s):

e. A diagram that clearly identifies and labels the setup of each monitoring point in relation to the facility process areas, the process water discharge point(s), and any wastewater treatment discharge point(s), including to a sewer:

Renergy's response: The monitoring information is not readily available to Renergy. This information is in the possession of OEPA.

ii. Emerald

a. A clear description of each monitoring location(s) in relation to the wastewater streams at your facility, including but not limited to the streams described in response to Question 2 above:

b. A diagram that clearly identifies and labels the monitoring system components:

c. A document identifying the monitoring methods used and your justification for selecting these methods:

d. Photo(s) of the monitoring location(s):

e. A diagram that clearly identifies and labels the setup of each monitoring point in relation to the facility process areas, the process water discharge point(s), and any wastewater treatment discharge point(s), including to a sewer:

Renergy's response: The monitoring information is not readily available to Renergy. This information is in the possession of OEPA.

iii. Steamtown

- a. A clear description of each monitoring location(s) in relation to the wastewater streams at your facility, including but not limited to the streams described in response to Question 2 above:
- b. A diagram that clearly identifies and labels the monitoring system components:
- c. A document identifying the monitoring methods used and your justification for selecting these methods:
- d. Photo(s) of the monitoring location(s):
- e. A diagram that clearly identifies and labels the setup of each monitoring point in relation to the facility process areas, the process water discharge point(s), and any wastewater treatment discharge point(s), including to a sewer:

Renergy's response: The monitoring information is not readily available to Renergy. This information is in the possession of OEPA.

Michael Oberfield

Request 8 - For each facility identified in response to Question 1, provide copies of all written correspondence with the Ohio Environmental Protection Agency (OEPA) pertaining to any Notice of Violation (NOV) that may have been issued for the time period January 1, 2016 to the date of this request. Include issued NOVs and any corrective action plan along with dates, timelines, and current status of implementation for actions under the corrective action plan that was developed in response to issued NOVs. Provide all documentation, including reports, memos, and studies, to determine the final corrective action plan. In addition to the final corrective action plan, include all considered plans and technologies deemed infeasible.

- i. Dovetail

Renergy's response: Uploaded to the corresponding folder in the data room. All requested information may not be uploaded to the data room. OEPA is the best source for this information.

- ii. Emerald

Renergy's response: Uploaded to the corresponding folder in the data room. All requested information may not be uploaded to the data room. OEPA is the best source for this information.

- iii. Steamtown

Renergy's response: Uploaded to the corresponding folder in the data room. All requested information may not be uploaded to the data room. OEPA is the best source for this information.

Michael Oberfield

Request 9 - For the reported release of pollutants to the waters of the United States that occurred in Morrow County on April 17, 2021 and for which a Notice of Violation dated April 17, 2021 was issued by OEPA, provide a narrative description of.

i. Emerald (See 4/17/2021 NOV in folder “Request 8 - OEPA NOVs”)

a. The date, time and duration of the release: The release occurred on 4/17/2021 at approximately 3 pm. The exact duration is unknown but we believe that the release was discovered almost immediately on a drag line “inspection” that the contractor performed throughout land application operations.

b. The volume and nature of the material released, including a description of how the volume was calculated: The material released was solids digestate from the Emerald facility. Based on the incident report summary (see the corresponding folder in the data room) generated by OEPA, approximately, 2,500 gallons was estimated size of the release. Renergy is unaware how OEPA calculated the volume but Renergy’s land application contractor, Raw Handling, concurred with OEPA’s estimate.

c. The location(s) from which and to which the release occurred: Approximate location for both is 2258 County Road 156, Cardington, OH.

d. The cause(s) of the release: A drag line puncture.

e. How the release was discovered: Line inspection that occurs throughout land application operations.

f. By whom the release was discovered: Land application contractor Raw Handling.

g. The notification process after release discovery, to include for each notification -

i. date and time of notification: 4/17/2021 at approximately 3 pm.

ii. recipient of notification: OEPA

iii. content of notification: Spill occurred and was discovered.

h. Corrective actions taken to halt the release, including the date and time of the actions: Renergy shut down material pumping immediately upon discovery of the release.

i. Corrective actions taken to clean-up the release, including the date and time of the actions: Renergy shut down material pumping immediately upon discovery of the release. Renergy then worked in conjunction with OEPA to use dam installation and removal, aeration, etc. to mitigate the release. The incident investigation summary report from OEPA is in the corresponding folder in the data room.

j. Corrective actions taken to prevent future release, including the date and time of the actions: This was a hose failure. Hose was removed by land application contractor.

k. Actions taken to evaluate impact to the environment from the release, including a description of any monitoring (including visual monitoring), and the results of the evaluation: Multiple tests were taken and visual monitoring was performed. All results were deemed acceptable by OEPA. The incident investigation summary report from OEPA is in the corresponding folder in the data room.

Michael Oberfield

Request 10 - For each facility identified in response to Question 1, provide a copy of the most recent Stormwater Pollution Prevention Plan (SWPPP), including all attachments and date of state or local government approval.

i. Dovetail

Renergy's Response: Uploaded to the corresponding folder in the data room. OEPA is the best source for any missing information.

ii. Emerald

Renergy's Response: Uploaded to the corresponding folder in the data room. OEPA is the best source for any missing information.

iii. Steamtown

Renergy's Response: The SWPPP for Steamtown is not in Renergy's possession. OEPA is the best source for this information.

Michael Oberfield

Request 11 - For each facility identified in response to Question 1, provide a copy of the most recent Facility Operation Plan, including all attachments and date of state or local government approval.

i. Dovetail

Renergy's Response: Uploaded to the corresponding folder in the data room. Renergy has one Operation and Maintenance Plan for Dovetail, Emerald and Steamtown.

ii. Emerald

Renergy's Response: Uploaded to the corresponding folder in the data room. Renergy has one Operation and Maintenance Plan for Dovetail, Emerald and Steamtown.

iii. Steamtown

Renergy's Response: Uploaded to the corresponding folder in the data room. Renergy has one Operation and Maintenance Plan for Dovetail, Emerald and Steamtown.

Michael Oberfield

Request 12 - For each facility identified in response to Question 1, provide a copy of the most recent Spill Prevention, Control, and Countermeasure (SPCC) Plan, including all attachments and date of state or local government approval.

i. Dovetail

Renergy's response: Renergy uses the same Emergency Action Plan and Emergency Response Checklist for all three facilities. The Emergency Action Plan and Emergency Response Checklist are uploaded to the corresponding folder in the data room.

ii. Emerald

Renergy's response: Renergy uses the same Emergency Action Plan and Emergency Response Checklist for all three facilities. The Emergency Action Plan and Emergency Response Checklist are uploaded to the corresponding folder in the data room.

iii. Steamtown

Renergy's response: Renergy uses the same Emergency Action Plan and Emergency Response Checklist for all three facilities. The Emergency Action Plan and Emergency Response Checklist are uploaded to the corresponding folder in the data room.

Michael Oberfield

Request 13 - For each facility identified in response to Question 1, provide notes, copies, or narrative descriptions of any citizen complaints, including the date of the complaint, received from January 1, 2016 to the date of this request. Provide all documentation of actions taken by facility in response.

i. Dovetail

Renergy's response: Narrative descriptions of the formal citizen complaints for each facility are found in a single documents that is uploaded to the corresponding folder in the data room. The complaint list does not included belligerent calls or email from Nathan Hulick, or complaints on social media. It does, however, include narrative descriptions of the action taken in response by Renergy.

ii. Emerald

Renergy's response: Narrative descriptions of the citizen complaints for each facility are found in a single documents that is uploaded to the corresponding folder in the data room. The complaint list does not included belligerent calls or email from Nathan Hulick, or complaints on social media. It does, however, include narrative descriptions of the action taken in response by Renergy.

iii. Steamtown

Renergy's response: Narrative descriptions of the citizen complaints for each facility are found in a single documents that is uploaded to the corresponding folder in the data room. The complaint list does not included belligerent calls or email from Nathan Hulick, or complaints on social media. It does, however, include narrative descriptions of the action taken in response by Renergy.

Michael Oberfield

Finally, Renergy is committed to working cooperatively with U.S. EPA to adequately respond to the information request. Please do not hesitate to contact Renergy with any questions, comments, or concerns. We will respond as promptly and completely as possible. Thank you.

Cari Oberfield

Cari D. Oberfield

COO, Renergy, Inc.

August 23, 2021

CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a).

Cari Oberfield

Cari D. Oberfield

COO, Renergy, Inc.
August 23, 2021